

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
BERTRAM HIRSCH and IGOR ROMANOV, on	:	
behalf of themselves and all others similarly situated,	:	
	:	
Plaintiffs,	:	
	:	Case No. 12 Civ. 1124 (DAB)
vs.	:	
	:	
CITIBANK, N.A.,	:	
	:	
Defendant.	:	
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**APPENDIX OF TESTIMONY AND EXHIBITS TO  
DEFENDANT CITIBANK, N.A.'S PRE-HEARING BRIEF**

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January 23, 2014

INDEX OF TESTIMONY AND EXHIBITS TO  
DEFENDANT CITIBANK, N.A.'S PRE-HEARING BRIEF

<b>Transcript/Exhibit</b>	<b>Bates No.</b>	<b>Date</b>	<b>Document Description</b>
Transcript	N/A	1/6/2014	Deposition Transcript of Michael Ashley
Transcript	N/A	1/16/2014	Deposition Transcript of Bertram Hirsch
Transcript	N/A	1/7/2014	Deposition Transcript of Nancy Lewis
Transcript	N/A	1/9/2014	Deposition Transcript of Igor Romanov
Transcript	N/A	12/19/2013	Deposition Transcript of Vivian Safir
Transcript	N/A	1/9/2014	Deposition Transcript of Fazri Zubair
Ex. A	CITI-0000079	10/25/2010	Citibank Concierge Daily Transaction/Transmittal Report (Plaintiffs' Ex. 9 at deposition of Michael Ashley (Ashley: 34:17-20))
Ex. B	CITI-0000077	10/25/2010	Citibank Concierge Daily Transaction/Transmittal Report (Plaintiffs' Ex. 30 at deposition of Fazri Zubair (Zubair: 17:23-18:6))
Ex. C	CITI-0000080	10/25/2010	Citibank signature card – Bertram Hirsch (Ex. 3 at deposition of Bertram Hirsch (Hirsch: 53:2-13))
Ex. D	CITI-0000078	10/25/2010	Citibank signature card – Igor Romanov (Plaintiffs' Ex. 36 at deposition of Igor Romanov (Romanov: 11:17-12:1, 36:15-21))
Ex. E	N/A	12/23/2013	Verified Responses and Objections to Plaintiffs' First Set of Interrogatories (without attachments)
Ex. F	CITI-0000155-183	7/1/2010	Client Manual – Consumer Accounts (effective July 1, 2010) (referenced and attached to Verified Responses and Objections to Plaintiffs' First Set of Interrogatories, Plaintiffs' Ex 11 at deposition of Michael Ashley (Ashley: 59:11-12, 60:2-7), Plaintiffs' Ex. 20 at deposition of Nancy Lewis (Lewis: 15:7-15), Plaintiffs' Ex. 31 at deposition of Fazri Zubair (Zubair: 17-30:14))
Ex. G	CITI-0000184-208 CITI-0000209-233	7/1/2010 7/1/2010	Marketplace Addendum – New York (effective July 2010) Marketplace Addendum – California and Nevada (effective July 2010) (referenced

<b>Transcript/Exhibit</b>	<b>Bates No.</b>	<b>Date</b>	<b>Document Description</b>
			and attached to Verified Responses and Objections to Plaintiffs' First Set of Interrogatories, Plaintiffs' Ex. 26 at deposition of Nancy Lewis (Lewis: 29:17-30:14)
Ex. H	CITI-000001-28	1/1/2010	Client Manual - Consumer Accounts (effective January 2010) (Plaintiffs' Ex. 5 at deposition of Vivian Safir) (Safir: 49:6-22)
Ex. I	CITI-0000119-132	3/4/2013	Personal Banker Foundations – Participant Guide, North America Consumer (Plaintiffs' Ex. 24 at deposition of Nancy Lewis (Lewis: 26:17-21)
Ex. J	N/A	1/8/2014	Letter from Joseph Strauss, Esq. (for Defendant Citibank) to Plaintiffs' counsel regarding Plaintiffs' response to document requests
Ex. K	Bertram Hirsch 10-11	10/25/2010	"Citi Products Opened/Applied For Today – Effective Date: October 25, 2010" (Ex. 5 at deposition of Bertram Hirsch) (Hirsch: 63:9-64:25)
Ex. L	N/A	10/25-11/25/2010	Citibank account statement dated November 25, 2010 (Ex. 7 at deposition of Bertram Hirsch (Hirsch: 82:10-21)
Ex. M	Bertram Hirsch 2-3	9/7/2010-10/31/2010	C2KB Direct Mail 40,000 AA Miles Checking Offer (Ex. 8 at deposition of Bertram Hirsch (Hirsch: 85:24-86:25)
Ex. N	N/A	11/1 – 11/30/2013	Savings/checking accounts statement – Igor Romanov (Defendant's Ex. 1 at deposition of Igor Romanov) (Romanov: 45:16-21)